

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

256 FIFTH AVENUE, 2ND FLOOR

NEW YORK, NEW YORK 10001

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 3/31/21

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ZACH INTRATER  
OF COUNSEL

ANDREA L. ZELLAN  
JACOB KAPLAN  
TENY R. GERAGOS  
ADMITTED IN NY & CA  
STUART GOLD

March 31, 2021

VIA ECF

Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

As part of the bail conditions in the above-referenced case, Mr. Rafael Jacobs's travel is limited to the Southern and Eastern Districts of New York and the District of New Jersey. We write the Court requesting a modification of these travel restrictions to allow Mr. Jacobs to travel to the Northern District of Georgia and the Southern District of Florida. Mr. Jacobs has an Independent Sales Organization contract with a credit card processing company in Alpharetta, Georgia, where he would like to travel, as part of his business installing and servicing credit card processing machines. He would like to travel to Georgia for meetings with the processing company and potentially to secure new clients. He also has numerous clients in the Southern District of Florida, with whom he would like to conduct business. Mr. Jacobs has taken several trips since the origination of this case and has always returned within the allotted time and has otherwise adhered scrupulously to his conditions of release.

BRAFMAN & ASSOCIATES, P.C.

We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (Officer Dominique Jackson). The Government has graciously consented to this request, and Pretrial Services has taken no position. Thank you for your consideration.

Respectfully submitted,

s/

Marc Agnifilo

Zach Intrater

cc: AUSAs Samuel Raymond & David Felton (via email)  
Pretrial Services Officer Dominique Jackson (via email)

The application is **GRANTED**.  
So Ordered.

 3/31/21